

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	
Consideration of the federal standard on	)	Docket No. 06-0525
interconnection in Section 1254 of the	)	
Energy Policy Act of 2005	)	

**COMMENTS OF THE AMEREN ILLINOIS UTILITIES**

Central Illinois Light Company d/b/a AmerenCILCO, Central Illinois Public Service Company d/b/a AmerenCIPS and Illinois Power Company d/b/a AmerenIP (“Ameren Illinois Utilities”) submit these comments in response to the Commission’s Order of July 26, 2006, (“Order”) initiating this proceeding. In the Order, the Commission noted the provision of the Energy Policy Act of 2005 (“EPAAct”), whereby state commissions are to consider the standard articulated in the amendment to paragraph 15 of Section 111(d) of the Public Utility Regulatory Policies Act of 1978 (“PURPA”), 16 USC 2621(d), for interconnecting generating facilities to local distribution facilities. That provision reads as follows:

(15) Interconnection. – Each electric utility shall make available, upon request, interconnection service to any electric consumer that the electric utility serves. For purposes of this paragraph, the term 'interconnection service' means service to an electric consumer under which an on-site generating facility on the consumer’s premises shall be connected to the local distribution facilities. Interconnection services shall be offered based upon the standards developed by the Institute of Electrical and Electronics Engineers: IEEE Standard 1547 for Interconnecting Distributed Resources with Electric Power Systems, as they may be amended from time to time. In addition, agreements and procedures shall be established whereby the services are offered shall promote current best practices of interconnection for distributed generation, including but not limited to practices stipulated in model codes adopted by associations of state regulatory agencies. All such agreements and procedures shall be just and reasonable, and not unduly discriminatory or preferential.

The Order also provides the above requirements may not apply if the state has undertaken certain actions prior to enactment, for example, having implemented the standard or a comparable standard. Order at 2.

The Ameren Illinois Utilities agree with the provision above, that the IEEE Standard 1547 provides a sound basis for the interconnection of small generators to the electric network. However, the standard as articulated works at a relatively high level and is, thus, somewhat limited to specific utility operating systems and electric networks. Because the IEEE Standard 1547 does not apply to all aspects of every generator's interconnection, the Ameren Illinois Utilities employ additional criterion and case specific requirements that allow them to comply with all of the appropriate standards in order to ensure small generators have access to the distribution system. These criterion or guidelines are provided for in working manuals such as Ameren's A3129 and A3131 manuals. These manuals provide the specific technical requirements that an interconnecting generator must meet. The technical requirements include, among others, the requirement that the standards of IEEE 1547 are met.

By way of example, some of the additional criterion and case specific requirements that an Ameren Illinois Utility might consider would be proximity to existing Ameren Illinois utility distribution facilities, loading and capacity of existing distribution, tapping and easement considerations and relaying and metering issues. In these instances, the Ameren Illinois Utility criterion or specific guidelines are better able to facilitate the interconnection process associated with specific generator types, certainly in a more efficient way than IEEE Standard 1547.

The Ameren Illinois Utilities also rely upon other guidelines and standards such as the American National Standards Institute (ANSI), IEEE, NFPA, and UL standards. Notably the standard at issue does contemplate the usage of “model codes”. Within these guidelines are other technical standards and requirements that can be utilized for specific generator types. By way of illustration, Ameren’s A3129 and A3131 manuals require that all high voltage equipment used by an Interconnection Customer be constructed in accordance with the latest applicable standards of the ANSI or the National Electrical Manufacturers Association and that all installations comply with article 705 of the National Electric Code latest revision.

In conclusion, the Ameren Illinois Utilities are of the view that nothing further is needed or required in regard to additional rules or standards to facilitate the interconnection of small generators to the utility distribution system.

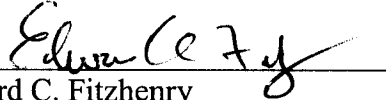
Dated: November 2, 2006

Respectfully submitted,

CENTRAL ILLINOIS LIGHT  
COMPANY  
d/b/a AmerenCILCO

CENTRAL ILLINOIS PUBLIC  
SERVICE COMPANY  
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ILLINOIS POWER COMPANY  
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CERTIFICATE OF SERVICE

I, hereby certify that a copy of the foregoing was served electronically to the Illinois Commerce Commission e-Docket and to all parties of record on this 2<sup>nd</sup> day of November, 2006.

  
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Edward C. Fitzhenry